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BY ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Nunez, et al. v. City of New York et al*, 11-cv-5845 (LTS)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel for the City of New York (the “City”), assigned to represent the City and the Department of Correction in this matter. I write to respectfully request that the Court enter the attached proposed Interim Protective Order. For the reasons set forth in the proposed Order, it is needed to facilitate the rapid sharing of documents and information with the plaintiffs while preserving confidentiality until any differences between the parties on that issue can be resolved. Plaintiffs and the Monitor consent to the entry of this order.

The City thanks the Court for its attention to this matter.

Sincerely,

Alan Scheiner /s/

Alan Scheiner

Encl.